

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**  
Northern Division

IN RE GRACE OCEAN PRIVATE  
LIMITED, *et al.*,  
  
Petitioners.

Civil Action No. 24-cv-000941-JKB  
  
IN ADMIRALTY

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**MOTION OF CERTAIN NONPARTY DALI CREWMEMBERS TO SEAL  
OBJECTIONS TO MAGISTRATE JUDGE DECISIONS ON MOTION TO  
STRIKE CONFIDENTIALITY DESIGNATIONS AND MOTIONS TO SEAL**

Pursuant to Local Rule 105.11 and Paragraph 9 of this Court’s protective order (ECF No. 474), certain nonparty deponents (“Objectors”)<sup>1</sup> hereby move to seal the unredacted version of their joint Objections to the Magistrate Judge’s decision at ECF No. 624, and in support thereof state:

1. Objectors designated portions of their deposition transcripts as “confidential” within the meaning of the protective order in this case. Claimants contested those designations through a motion to strike (ECF No. 513). Magistrate Judge Sullivan issued an opinion and order on the motion to strike and on related motions to seal (ECF No. 624). Judge Sullivan’s opinion is under seal, and it retains the seal over relevant sealed papers during the pendency of any appeal from his order.

2. The essential question before the Court is whether certain information should remain protected from disclosure, including on the public docket. To preserve the status quo pending resolution of the motion to strike, the parties necessarily needed to seal significant portions of the motion papers that reveal the content of the sealed information

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<sup>1</sup> The Objectors (and movants here) are: Karthikeyan Deenadayalan; Chandrashekar Sabhapathy; Chaminda Kariyawasam; Ganeshkumar Subramanian; and Nishanth Pitchaiah.

and the grounds therefor. The same reasoning applies during appeal from the Magistrate Judge's decision.

3. Objectors have prepared and will file a public version of their Objections that does not reveal information Objectors contend is protected.

4. On October 27, 2025, Objectors sent their proposed redactions from the Objections to a group of Claimants' counsel. Given their position on the motion to strike, Claimants can be expected to disagree that the Objections contain information that should be protected. As to interim sealing of the designated portions of the Objections, as of this writing, a couple of Claimants' counsel have stated they do not have an issue with Objectors' proposed redactions and none have stated that they do, but given the short time frame and the large number of Claimants' counsel, many have not yet responded.

Wherefore, Objectors respectfully requests that the motion to seal be granted.

Dated: October 28, 2025

Respectfully submitted,

/s/ Marshall N. Perkins

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 28th day of October, 2025, I caused copies of the foregoing document to be served through the ECF system on all registered counsel of record.

/s/ John J. Connolly  
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